



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

December 3, 2003

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Foil Laminating, Inc. / 09--15362-00050

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within thirty (30) days from the receipt of this notice** provided under IC 13-15-5-3. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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P. O. Box 6015
Indianapolis, Indiana 46206-6015
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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

Foil Laminating Inc., a Division of Glenmark Industries, Inc.
1000 Pidco Drive
Plymouth, Indiana 46563

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 099-15362-00050	
Issued by: Original by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 3, 2003 Expiration Date: December 3, 2008

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary gravure coating and printing source.

Responsible Official:	Plant Manager
Source Address:	1000 Pidco Drive, Plymouth, Indiana 46563
Mailing Address:	1000 Pidco Drive, Plymouth, Indiana 46563
General Source Phone Number:	574 - 935 - 3645
SIC Code:	2672
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Cerutti Model V6-X451 rotogravure printer/coater, constructed after 1997, equipped with one (1) 1.8 million British thermal units per hour natural gas-fired curing oven, identified as Unit #1, exhausting to Stack S1, capacity: 82,500 square feet per hour.
- (b) One (1) Eclipse model 200 RH-D5 laminator/coater, constructed in 1995, equipped with one (1) 2.0 million British thermal units per hour natural gas-fired curing oven, identified as Unit #2, exhausting to Stack S2, capacity: 67,500 square feet per hour.
- (c) One (1) Inta-Roto laminator/coater, constructed in 1994, equipped with one (1) 0.75 million British thermal units per hour natural gas-fired curing oven, identified as Unit #3, exhausting to Stack S3, capacity: 65,000 square feet per hour.
- (d) One (1) Inta-Roto laminator/coater, constructed in 1994, equipped with one (1) 1.0 million British thermal units per hour natural gas-fired curing oven, identified as Unit #4, exhausting to Stack S4, capacity: 57,300 square feet per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Northern Regional Office: 574-245-4870, facsimile 574-245-4877
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except

for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted

by this permit.

- (b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may

provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b)(1), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52, Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-1 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 15, 2002.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is

due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) Cerutti Model V6-X451 rotogravure printer/coater, constructed after 1997, equipped with one (1) 1.8 million British thermal units per hour natural gas-fired curing oven, identified as Unit #1, exhausting to Stack S1, capacity 82,500 square feet per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60 Subpart QQ.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-5-5(c)(1)]

Pursuant to 326 IAC 8-5-5(c)(1) (Paper Coating Operations), the ink, as applied to the substrate from the one (1) rotogravure printer/coater, shall contain twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water.

D.1.3 Rotogravure Printing Press NSPS [326 IAC 12] [40 CFR 60.430, Subpart QQ]

Pursuant to 40 CFR 60.432, the Permittee shall not cause to be discharged into the atmosphere from the one (1) rotogravure printer/coater VOC equal to more than 16 percent (16%) of the total mass of VOC solvent and water used at that facility during one performance averaging period. The water used includes only that water contained in the waterborne raw inks and related coatings and the water added for dilution with waterborne ink systems.

D.1.4 Hazardous Air Pollutants (HAPs) [40 CFR 63.820, Subpart KK] [326 IAC 20]

The total amount of any single HAP and combination of HAPs used at the source shall be limited to less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month. Therefore, this source is an area source of HAPs, and the requirements of 40 CFR 60.820, Subpart KK, are not applicable.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 12] [40 CFR 60.433, Subpart QQ]

Pursuant to 40 CFR 60.433, the Permittee shall conduct performance tests in accordance with 40 CFR 60.8, under the following conditions:

- (a) The performance averaging period for each test is 30 consecutive calendar days and not an average of three separate runs as prescribed under 40 CFR 60.8(f)
- (b) Except as provided under 40 CFR 60.433 (f) and (g), if affected facilities routinely share the same raw ink storage/handling system with existing facilities, then temporary measurement procedures for segregating the raw inks, related coatings, VOC solvent, and water used at the affected facilities must be employed during the test. For this case, an overall emission percentage for the combined facilities as well as for only the affected facilities must be calculated during the test.

- (c) For the purpose of measuring bulk storage tank quantities of each color of raw ink and each related coating used, the Permittee shall install, calibrate, maintain and continuously operate during the test one or more:
 - (1) Non-resettable totalizer metering device(s) for indicating the cumulative liquid volumes used at each affected facility; or
 - (2) Segregated storage tanks for each affected facility to allow determination of the liquid quantities used by measuring devices other than the press meters required under item 1) of this article; or
 - (3) Storage tanks to serve more than one facility with the liquid quantities used determined by measuring devices other than press meters, if facilities are combined as described under 40 CFR 60.433 (d), (f), or (g).
- (d) The Permittee may choose to install an automatic temperature compensator with any liquid metering device used to measure the raw inks, related coatings, water, or VOC solvent used, or VOC solvent recovered.
- (e) Records of the measured amounts used at the affected facility and the liquid temperature at which the amounts were measured are maintained for each shipment of all purchased material or on at least a weekly basis for:
 - (1) The raw inks and related coatings used;
 - (2) The VOC and water content of each raw ink and related coating used as determined according to 40 CFR 60.435.
 - (3) The VOC solvent and water added to the inks used;
 - (4) The VOC solvent used as a cleaning agent; and
 - (5) The VOC solvent recovered.
- (f) The density variations with temperature of the raw inks, related coatings, VOC solvents used, and VOC solvent recovered are determined by the methods stipulated in 40 CFR 60.435(d).
- (g) The calculated emission percentage may be reported as rounded-off to the nearest whole number.
- (h) Printing press startups and shutdowns are not included in the exemption provisions under 40 CFR 60.8(c). Frequent periods of press startups and shutdowns are normal operations and constitute representative conditions for the purpose of a performance test.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.433, Subpart QQ]

- (a) If an affected facility uses waterborne ink systems or a combination of waterborne and solvent-borne ink systems with a solvent recovery system, compliance is determined by the following procedures except as provided in 40 CFR 60.433 (d), (e), (f), and (g):
 - (1) The mass of VOC in the solvent-borne and waterborne raw inks and related coatings used is determined by the following equation:

$$(M_o)_a = \sum_{i=1}^k (M_{ci})_a (W_{oi})_a + \sum_{i=1}^m 3 (L_{ci})_a (D_{ci})_a (W_{oi})_a + \sum_{i=1}^n 3 (L_{ci})_a (V_{oi})_a (D_{oi})_a$$

where:

k is the total number of raw inks and related coatings measured as used in direct mass quantities with different amounts of VOC content.

m is the total number of raw inks and related coatings measured as used by volume with different amounts of VOC content or different densities.

n is the total number of raw inks and related coatings measured as used by volume with different amounts of VOC content or different VOC solvent densities.

- (2) The total mass of VOC used is determined by the following equation:

$$(M_t)_a = (M_o)_a + \sum_{i=1}^m 3 (L_{di})_a (D_{di})_a + (M_d)_a + \sum_{i=1}^n 3 (L_{gi})_a (D_{gi})_a + (M_g)_a$$

where “**m**” and “**n**” are respective total numbers of VOC dilution and cleaning solvents measured as used by volume with different densities.

- (3) The mass of water in the waterborne raw inks and related coatings used is determined by the following equation:

$$(M_w)_a = \sum_{i=1}^k (M_{ci})_a (W_{wi})_a + \sum_{i=1}^m 3 (L_{ci})_a (D_{ci})_a (W_{wi})_a + \sum_{i=1}^n 3 (L_{ci})_a (V_{wi})_a (D_{wi})_a$$

where:

k is the total number of raw inks and related coatings measured as used in direct mass quantities with different amounts of water content.

m is the total number of raw inks and related coatings measured as used by volume with different amounts of water content or different densities.

n is the total number of raw inks and related coatings measured as used by volume with different amounts of water content or different water densities.

- (4) The total mass of water used is determined by the following equation:

$$(M_v)_a = (M_w)_a + (M_h)_c + \sum_{i=1}^m \frac{3}{3} (L_{hi})_a (D_{hi})_a$$

where "m" is the total number of water dilution additions measured as used by volume with different densities.

- (5) The total mass of VOC solvent recovered is determined by the following equation:

$$(M_r)_a = (M_m)_a + \sum_{i=1}^k \frac{3}{3} (L_{mi})_a (D_{mi})_a$$

where "k" is the total number of VOC solvents, miscellaneous solvent-borne waste inks, and waste VOC solvents measured as recovered by volume with different densities.

- (6) The average VOC emission percentage for the affected facility is determined by the following equation:

$$P_a = \frac{[(M_t)_a - (M_r)_a]}{[(M_t)_a + (M_v)_a]} \times 100$$

- (b) Pursuant to 40 CFR 60.435:

- (1) The Permittee of any affected facility using waterborne ink systems shall determine the VOC and water content of raw inks and related coatings used at the affected facility by:
 - (A) Determination of the VOC and water content from the formulation data supplied by the ink manufacturer with each shipment of purchased raw inks and related coatings used; or
 - (B) Analysis of samples of each shipment of purchased raw inks and related coatings using a test method approved by the Administrator in accordance with 40 CFR 60.8(b).
- (2) The Permittee of any affected facility shall determine the density of raw inks, related coatings, and VOC solvents by:
 - (A) Making a total of three determinations for each liquid sample as specified temperatures using the procedure outlined in ASTM D 1475-60 (Reapproved 1980), which is incorporated by reference. It is available from the American Society of Testing and Materials, 1916 Race Street, Philadelphia, Pennsylvania 19103. It is also available for inspection at the Office of the Federal Register, 800 North Capitol Street, NW., suite 700, Washington, DC. This incorporation by reference was approved by the Director of the Federal Register on November 8, 1982. This material is incorporated as it exists on the date of approval and a notice of any change in these materials will be published in the Federal Register. The temperature and density is recorded as the arithmetic average of the three determinations; or

- (B) Using literature values, at specified temperatures, acceptable to the Administrator.
- (3) If compliance is determined according to 40 CFR 60.433(e), (f), or (g), the existing as well as affected facilities are subject to the requirements of 40 CFR 60.435, sections (a) through (d).

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no specific Compliance Monitoring Requirements applicable to this emission unit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements [40 CFR 60, Subpart QQ] [326 IAC 12]

Pursuant to 40 CFR 60.434, after completion of the performance test required by 40 CFR 60.8, the Permittee of any facility using waterborne ink systems or solvent-borne ink systems with solvent recovery systems shall record the amount and water used, solvent recovered, and estimated emission percentage for each performance averaging period and shall maintain these records for 2 years. The emission percentage is estimated as follows:

- (a) The performance averaging period for monitoring of proper operation and maintenance is a calendar month or 4 consecutive weeks, at the option of the Permittee.
- (b) If affected facilities share the same raw ink storage/handling system with existing facilities, solvent recovered, and emission percentages for the combined facilities may be documented. Separate emission percentage for only the affected facilities are not required in this case. The combined emission percentage is compared to the overall average for the existing and affected facilities' emission percentage determined during the most recent performance test.
- (c) Except as provided in (d) below, temperatures and liquid densities determined during the most recent performance test are used to calculate corrected volumes and mass quantities.
- (d) The Permittee may choose to measure temperatures for determination of actual liquid densities during each performance averaging period. A different base temperature may be used for each performance averaging period if desired by the Permittee.
- (e) The emission percentage is calculated according to the procedures under 40 CFR 60.433 (b) through (g), whichever applies, or by a comparable calculation which compares the total solvent recovered to the total solvent used at the affected facility.

D.1.9 Rotogravure Printing Press NESHAP [40 CFR 63.820, Subpart KK] [326 IAC 20]

Pursuant to 40 CFR 63.829(d), the Permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with source-wide usage less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of any combination of HAPs, including the mass of all HAP containing materials used and the mass fraction of HAP present in

each HAP containing material used, on a monthly basis.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.4, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit and HAPs usage limits established in Conditions D.1.2 and D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount of VOC and HAP in each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) The total VOC and HAP usage for each month; and
- (3) The weight of VOCs and HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.12 NSPS Reporting Requirement [40 CFR 60, Subpart QQ] [326 IAC 12]

Pursuant to the New Source Performance Standards (NSPS), 40 CFR Part 60.432, Subpart QQ, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- (a) Actual start-up date (within 15 days after such date); and
- (b) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

The application and enforcement of these standards have been delegated to the IDEM OAQ. The requirements of 40 CFR Part 60 are also federally enforceable.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) One (1) Eclipse model 200 RH-D5 laminator/coater, constructed in 1995, equipped with one (1) 2.0 million British thermal units per hour natural gas-fired curing oven, identified as Unit #2, exhausting to Stack S2, capacity: 67,500 square feet per hour.
- (c) One (1) Inta-Roto laminator/coater, constructed in 1994, equipped with one (1) 0.75 million British thermal units per hour natural gas-fired curing oven, identified as Unit #3, exhausting to Stack S3, capacity: 65,000 square feet per hour.
- (d) One (1) Inta-Roto laminator/coater, constructed in 1994, equipped with one (1) 1.0 million British thermal units per hour natural gas-fired curing oven, identified as Unit #4, exhausting to Stack S4, capacity: 57,300 square feet per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of two and nine-tenths (2.9) pounds per gallon of coating excluding water, delivered to the coating applicators at the three (3) laminators/coaters, identified as Units #2, #3 and #4.

Compliance Determination Requirements

D.2.2 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differ-

entiate between those added to coatings and those used as cleanup solvents;

- (2) The VOC content of the coatings used for each month;
- (3) The total VOC usage for each month; and
- (4) The weight of VOCs emitted for each compliance period.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Foil Laminating Inc., a Division of Glenmark Industries, Inc.
Source Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Mailing Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T 099-15362-00050

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Foil Laminating Inc., a Division of Glenmark Industries, Inc.
Source Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Mailing Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T 099-15362-00050

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
cThe Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
cThe Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Foil Laminating Inc., a Division of Glenmark Industries, Inc.
Source Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Mailing Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T 099-15362-00050
Facility: Entire source
Parameter: HAPs usage
Limit: Single HAP less than ten (10) tons, combination HAPs less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Single HAP (tons)	Combination of HAPs (tons)	Single HAP (tons)	Combination of HAPs (tons)	Single HAP (tons)	Combination of HAPs (tons)
	This Month	This Month	Previous 11 Months	Previous 11 Months	12 Month Total	12 Month Total

- 9 No deviation occurred in this month.
9 Deviation/s occurred in this month.

Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Foil Laminating Inc., a Division of Glenmark Industries, Inc.
Source Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Mailing Address: 1000 Pidco Drive, Plymouth, Indiana 46563
Part 70 Permit No.: T 099-15362-00050

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name: Foil Laminating Inc., a Division of Glenmark Industries, Inc.
Source Location: 1000 Pidco Drive, Plymouth, Indiana 46563
County: Marshall
SIC Code: 2672
Operation Permit No.: T 099-15362-00050
Permit Reviewer: Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed a Part 70 permit renewal application from Foil Laminating Inc. relating to the operation of a gravure coating and printing operation. Foil Laminating Inc. was issued a Part 70 permit, T 099-7439-00050, on December 30, 1997.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) Cerutti Model V6-X451 rotogravure printer/coater, constructed after 1997, equipped with one (1) 1.8 million British thermal units per hour natural gas-fired curing oven, identified as Unit #1, exhausting to Stack S1, capacity: 82,500 square feet per hour.
- (b) One (1) Eclipse model 200 RH-D5 laminator/coater, constructed in 1995, equipped with one (1) 2.0 million British thermal units per hour natural gas-fired curing oven, identified as Unit #2, exhausting to Stack S2, capacity: 67,500 square feet per hour.
- (c) One (1) Inta-Roto laminator/coater, constructed in 1994, equipped with one (1) 0.75 million British thermal units per hour natural gas-fired curing oven, identified as Unit #3, exhausting to Stack S3, capacity: 65,000 square feet per hour.
- (d) One (1) Inta-Roto laminator/coater, constructed in 1994, equipped with one (1) 1.0 million British thermal units per hour natural gas-fired curing oven, identified as Unit #4, exhausting to Stack S4, capacity: 57,300 square feet per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour: one (1) air makeup unit, rated at 3.8 million British thermal units per hour.
- (b) Combustion source flame safety purging on startup.
- (c) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Closed loop heating and cooling systems.
- (e) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (f) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. Negligible PM emissions.
- (g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (h) Purge double block and bleed valves.

Existing Approvals

The source has been operating under the following previous approvals including:

T 099-7439-00050, issued on December 30, 1997.

All terms and conditions from previous approvals issued pursuant to the permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous approvals are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete and timely Part 70 permit renewal application for the purposes of this review was received on March 8, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Potential To Emit (tons/year)
PM	0.078
PM ₁₀	0.311
SO ₂	0.025
VOC	136
CO	3.44
NO _x	4.10

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Benzene	0.00009
Dichlorobenzene	0.00005
Formaldehyde	0.003
Hexane	0.074
Toluene	0.0001
Lead Compounds	0.00002
Cadmium Compounds	0.00005
Chromium Compounds	0.00006
Manganese Compounds	0.00002
Nickel Compounds	0.00009
Glycol Ethers	9.54

HAPs	Potential To Emit (tons/year)
Styrene	2.38
Diethanolamine	16.7
TOTAL	28.7

- (a) The unrestricted potential emissions of VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential emissions of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM ₁₀	not reported
SO ₂	not reported
VOC	2.00
CO	0.00
NO _x	not reported
HAP (specify)	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Rotogravure (Unit #1)	0.015	0.060	0.005	43.1	0.662	0.788	Single less than 10.0
Laminators (Units #2, #3, #4)	0.031	0.125	0.010	93.2	1.38	1.64	Total less than 25.0
Insignificant Activities	0.032	0.126	0.010	0.092	1.40	1.66	
Total Emissions	0.078	0.311	0.025	136	3.44	4.09	Single less than 10.0 Total less than 25.0

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marshall County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This Part 70 Operating Permit does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 with the potential to emit before controls equal to or greater than the major source threshold. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable.
- (b) The one (1) Cerutti Model V6-X451 rotogravure printer/coater is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.430, Subpart QQ), because it is a publication rotogravure printing press that was constructed after October 28, 1980.

- (1) Pursuant to 40 CFR 60.432:

The Permittee shall not cause to be discharged into the atmosphere from the affected facility VOC equal to more than 16 percent of the total mass of VOC solvent and water used at that facility during one performance averaging period. The water used includes only that water contained in the waterborne raw inks and related coatings and the water added for dilution with waterborne ink systems.

- (2) Pursuant to 40 CFR 60.433:

- (A) The Permittee shall conduct performance tests in accordance with 40 CFR 60.8, under the following conditions:

- (i) The performance averaging period for each test is 30 consecutive calendar days and not an average of three separate runs as prescribed under 40 CFR 60.8(f)
- (ii) Except as provided under 40 CFR 60.433 (f) and (g), if affected facilities routinely share the same raw ink storage/handling system with existing facilities, then temporary measurement procedures for segregating the raw inks, related coatings, VOC solvent, and water used at the affected facilities must be employed during the test. For this case, an overall emission percentage for the combined facilities as well as for only the affected facilities must be calculated during the test.
- (iii) For the purpose of measuring bulk storage tank quantities of each color of raw ink and each related coating used, the Permittee shall install, calibrate, maintain and continuously operate during the test one or more:

- (a) Non-resettable totalizer metering device(s) for indicating the cumulative liquid volumes used at each affected facility; or
 - (b) Segregated storage tanks for each affected facility to allow determination of the liquid quantities used by measuring devices other than the press meters required under item 1) of this article; or
 - (c) Storage tanks to serve more than one facility with the liquid quantities used determined by measuring devices other than press meters, if facilities are combined as described under 40 CFR 60.433 (d), (f), or (g).
 - (iv) The Permittee may choose to install an automatic temperature compensator with any liquid metering device used to measure the raw inks, related coatings, water, or VOC solvent used, or VOC solvent recovered.
 - (v) Records of the measured amounts used at the affected facility and the liquid temperature at which the amounts were measured are maintained for each shipment of all purchased material or on at least a weekly basis for:
 - (a) The raw inks and related coatings used;
 - (b) The VOC and water content of each raw ink and related coating used as determined according to 40 CFR 60.435.
 - (c) The VOC solvent and water added to the inks used;
 - (d) The VOC solvent used as a cleaning agent; and
 - (e) The VOC solvent recovered.
 - (vi) The density variations with temperature of the raw inks, related coatings, VOC solvents used, and VOC solvent recovered are determined by the methods stipulated in 40 CFR 60.435(d).
 - (vii) The calculated emission percentage may be reported as rounded-off to the nearest whole number.
 - (viii) Printing press startups and shutdowns are not included in the exemption provisions under 40 CFR 60.8(c). Frequent periods of press startups and shutdowns are normal operations and constitute representative conditions for the purpose of a performance test.
- (B) If an affected facility uses waterborne ink systems or a combination of waterborne and solvent-borne ink systems with a solvent recovery system, compliance is determined by the following procedures except as provided in 40 CFR 60.433 (d), (e), (f), and (g):

- (i) The mass of VOC in the solvent-borne and waterborne raw inks and related coatings used is determined by the following equation:

$$(M_o)_a = \sum_{i=1}^k 3 (M_{ci})_a (W_{oi})_a + \sum_{i=1}^m 3 (L_{ci})_a (D_{ci})_a (W_{oi})_a + \sum_{i=1}^n 3 (L_{ci})_a (V_{oi})_a (D_{oi})_a$$

where:

k is the total number of raw inks and related coatings measured as used in direct mass quantities with different amounts of VOC content.

m is the total number of raw inks and related coatings measured as used by volume with different amounts of VOC content or different densities.

n is the total number of raw inks and related coatings measured as used by volume with different amounts of VOC content or different VOC solvent densities.

For the one (1) rotogravure printer/coater:

$$\begin{aligned} k &= m = n = 1 \\ M_c &= 5.09 \text{ lb/gal} \\ W_o &= 0.056 \\ L_c &= 5.45 \text{ lb/gal} \\ D_c &= 8.7 \text{ lb/gal} \\ V_o &= 0.0692 \end{aligned}$$

$$M_o = (5.09)(0.056) + (5.45)(8.7)(0.056) + (5.45)(0.0692)(8.7)$$

$$M_o = 6.22 \text{ lb/gal}$$

- (ii) The total mass of VOC used is determined by the following equation:

$$(M_t)_a = (M_o)_a + \sum_{i=1}^m 3 (L_{di})_a (D_{di})_a + (M_d)_a + \sum_{i=1}^n 3 (L_{gi})_a (D_{gi})_a + (M_g)_a$$

where “**m**” and “**n**” are respective total numbers of VOC dilution and cleaning solvents measured as used by volume with different densities.

For the one (1) rotogravure printer/coater:

$$\begin{aligned} m &= n = 1 \\ M_o &= 6.22 \\ D_d &= M_d = L_g = D_g = M_g = 0 \end{aligned}$$

$$\begin{aligned} M_t &= 6.22 + 0 + 0 + 0 \\ M_t &= 6.22 \text{ lb/gal} \end{aligned}$$

- (iii) The mass of water in the waterborne raw inks and related coatings used is determined by the following equation:

$$\begin{aligned} (M_w)_a &= \sum_{i=1}^k (M_{ci})_a (W_{wi})_a + \sum_{i=1}^m (L_{ci})_a (D_{ci})_a (W_{wi})_a \\ &\quad + \sum_{i=1}^n \frac{1}{3} (L_{ci})_a (V_{wi})_a (D_{wi})_a \end{aligned}$$

where:

k is the total number of raw inks and related coatings measured as used in direct mass quantities with different amounts of water content.

m is the total number of raw inks and related coatings measured as used by volume with different amounts of water content or different densities.

n is the total number of raw inks and related coatings measured as used by volume with different amounts of water content or different water densities.

For the one (1) rotogravure printer/coater:

$$\begin{aligned} k &= m = n = 1 \\ M_c &= 5.09 \text{ lb/gal} \\ W_w &= 0.53 \\ L_c &= 5.45 \text{ lb/gal} \\ D_c &= 8.7 \text{ lb/gal} \\ V_w &= 0.557 \\ D_w &= 8.34 \text{ lb/gal} \end{aligned}$$

$$\begin{aligned} M_w &= (5.09)(0.53) + (5.45)(8.7)(0.53) + (5.45)(0.557)(8.34) \\ M_w &= 53.14 \text{ lb/gal} \end{aligned}$$

- (iv) The total mass of water used is determined by the following equation:

$$(M_v)_a = (M_w)_a + (M_h)_c + \sum_{i=1}^m \frac{1}{3} (L_{hi})_a (D_{hi})_a$$

where "m" is the total number of water dilution additions measured as used by volume with different densities.

For the one (1) rotogravure printer/coater:

$$\begin{aligned}m &= 1 \\M_w &= 53.14 \text{ lb/gal} \\M_h &= 4.61 \text{ lb/gal} \\L_h &= 4.85 \text{ lb/gal} \\D_h &= 8.34 \text{ lb/gal}\end{aligned}$$

$$\begin{aligned}M_v &= 53.14 + 4.61 + (4.85)(8.34) \\M_v &= 98.20 \text{ lb/gal}\end{aligned}$$

- (v) The total mass of VOC solvent recovered is determined by the following equation:

$$(M_r)_a = (M_m)_a + \sum_{i=1}^k (L_{mi})_a (D_{mi})_a$$

where "k" is the total number of VOC solvents, miscellaneous solvent-borne waste inks, and waste VOC solvents measured as recovered by volume with different densities.

For the one (1) rotogravure printer/coater:

$$\begin{aligned}k &= 1 \\M_m &= L_m = D_m = 0\end{aligned}$$

$$\begin{aligned}M_r &= 0 + 0 + 0 \\M_r &= 0 \text{ lb/gal}\end{aligned}$$

- (vi) The average VOC emission percentage for the affected facility is determined by the following equation:

$$P_a = [(M_t)_a - (M_r)_a] / [(M_t)_a + (M_v)_a] \times 100$$

For the one (1) rotogravure printer/coater:

$$\begin{aligned}M_t &= 6.22 \text{ lb/gal} \\M_r &= 0 \text{ lb/gal} \\M_v &= 98.20 \text{ lb/gal}\end{aligned}$$

$$\begin{aligned}P_a &= (6.22 - 0) / (6.22 + 98.20) \times 100\% \\P_a &= 5.96\% < 16\%\end{aligned}$$

Therefore, the one (1) rotogravure printer/coater is in compliance.

- (3) 40 CFR 60.433(c) through (g) are not applicable to the one (1) rotogravure printer/coater because it is applicable to the requirements of 40 CFR 60.433(b).
- (4) Pursuant to 40 CFR 60.434:

- (A) After completion of the performance test required by 40 CFR 60.8, the Permittee of any facility using waterborne ink systems or solvent-borne ink systems with solvent recovery systems shall record the amount and water used, solvent recovered, and estimated emission percentage for each performance averaging period and shall maintain these records for 2 years. The emission percentage is estimated as follows:
 - (i) The performance averaging period for monitoring of proper operation and maintenance is a calendar month or 4 consecutive weeks, at the option of the Permittee.
 - (ii) If affected facilities share the same raw ink storage/handling system with existing facilities, solvent recovered, and emission percentages for the combined facilities may be documented. Separate emission percentage for only the affected facilities are not required in this case. The combined emission percentage is compared to the overall average for the existing and affected facilities' emission percentage determined during the most recent performance test.
 - (iii) Except as provided in article (4) of this paragraph, temperatures and liquid densities determined during the most recent performance test are used to calculate corrected volumes and mass quantities.
 - (iv) The Permittee may choose to measure temperatures for determination of actual liquid densities during each performance averaging period. A different base temperature may be used for each performance averaging period if desired by the Permittee.
 - (v) The emission percentage is calculated according to the procedures under 40 CFR 60.433(b) through (g), whichever applies, or by a comparable calculation which compares the total solvent recovered to the total solvent used at the affected facility.
- (5) Pursuant to 40 CFR 60.435: 40 CFR 60.435 (a) and (b) are not applicable because the one (1) rotogravure printer/coater uses a waterborne ink system.
 - (A) The Permittee of any affected facility using waterborne ink systems shall determine the VOC and water content of raw inks and related coatings used at the affected facility by:
 - (i) Determination of the VOC and water content from the formulation data supplied by the ink manufacturer with each shipment of purchased raw inks and related coatings used; or
 - (ii) Analysis of samples of each shipment of purchased raw inks and related coatings using a test method approved by the Administrator in accordance with 40 CFR 60.8(b).
 - (B) The Permittee of any affected facility shall determine the density of raw inks, related coatings, and VOC solvents by:
 - (i) Making a total of three determinations for each liquid sample as

specified temperatures using the procedure outlined in ASTM D 1475-60 (Reapproved 1980), which is incorporated by reference. It is available from the American Society of Testing and Materials, 1916 Race Street, Philadelphia, Pennsylvania 19103. It is also available for inspection at the Office of the Federal Register, 800 North Capitol Street, NW., suite 700, Washington, DC. This incorporation by reference was approved by the Director of the Federal Register on November 8, 1982. This material is incorporated as it exists on the date of approval and a notice of any change in these materials will be published in the Federal Register. The temperature and density is recorded as the arithmetic average of the three determinations; or

- (ii) Using literature values, at specified temperatures, acceptable to the Administrator.
- (C) If compliance is determined according to 40 CFR 60.433(e), (f), or (g), the existing as well as affected facilities are subject to the requirements of 40 CFR 60.435, sections (a) through (d).
- (c) The one (1) rotogravure printer/coater is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), (40 CFR 63.820, Subpart KK). Since the printer/coater is located at an area source of HAPs, the printer/coater is subject only to the provisions of 63.829(d) and 63.830(b)(1).
 - (1) Pursuant to 40 CFR 63.829(d), the Permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with source-wide usage less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of any combination of HAPs, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.
 - (2) Pursuant to 40 CFR 63.830(b)(1), the Permittee shall submit the annual notification required by 40 CFR 63.9(b).
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paper and Other Web Coating (40 CFR 63, Subpart JJJJ), are not applicable because this source is not a major source of HAPs, as defined in 40 CFR 63.2. The applicant has agreed to limit emissions of the worst case single HAP to less than ten (10) tons per year, and to limit emissions of total HAPs to less than twenty-five (25) tons per year.
- (e) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source is not a major source of HAPs. The applicant has agreed to limit emissions of the worst case single HAP to less than ten (10) tons per year, and to limit emissions of total HAPs to less than twenty-five (25) tons per year.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed after August 7, 1977. The source is not one of the 28 listed source

categories under 326 IAC 2-2, and the potential to emit of PM₁₀, VOC, NO_x, CO and SO₂ are each less than two-hundred fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable, and this source is a minor source with respect to this rule.

326 IAC 2-4.1 (New source toxics control)

- (a) For the one (1) Cerutti Model V6-X451 rotogravure printer/coater, identified as Unit #1, constructed after 1997, the potential to emit of the worst case single HAP is less than ten (10) tons per year, and the potential to emit of total HAPs is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-4.1 are not applicable. Any change or modification to the rotogravure printer/coater that would increase the potential to emit HAPs from the unit to ten (10) tons per year for the worst case single HAP, or twenty-five (25) tons per year of combination HAPs, shall require approval from IDEM, OAQ.
- (b) The three (3) laminator/coaters, identified as Units #2, #3 and #4, were each constructed prior to July 27, 1997, the applicability date of this rule. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC in Marshall County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirements as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 2-7 (Part 70 Operating Permit)

The applicant has accepted a source-wide HAPs usage limit of less than ten (10) tons per year for the worst case single HAP, and less than twenty-five (25) tons per year for total HAPs. Therefore, this source is an area source of HAPs, pursuant to the definition in 40 CFR 63.2.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

This rule requires that the source not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

State Rule Applicability - Individual Facilities

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The one (1) rotogravure printer/coater and the three (3) laminator/coaters are not subject to the requirements of 326 IAC 6-3, since the processes do not produce particulate matter emissions.

326 IAC 8-2-5 (Paper Coating Operations)

The three (3) laminators/coaters, identified as Units #2, #3 and #4, are subject to the requirements of 326 IAC 8-2-5, since they were each constructed after July 1, 1990, the actual VOC emissions are greater than fifteen (15) pounds per day, and the units saturate 100% of the substrate. Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the three (3) laminators/coaters, identified as Units #2, #3 and #4, shall be limited to 2.9 pounds of VOCs per gallon of coating less water.

Based on the MSDS submitted by the source and calculations made, the three (3) laminators/coaters, identified as Units #2, #3 and #4, are in compliance with this requirement.

326 IAC 8-5-5 (Graphic Arts Operations)

The one (1) rotogravure printer/coater, identified as Unit #1, is subject to the requirements of 326 IAC 8-5-5, since it was constructed after November 1, 1980 and the potential VOC emissions are greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-5-5(c)(1), the ink, as applied to the substrate, shall contain twenty-five percent (25%) by volume or less of volatile organic compound and seventy-five percent (75%) by volume or more of water.

Based on the MSDS submitted by the source and calculations made, the one (1) rotogravure printer/coater, identified as Unit #1, is in compliance with this requirement.

State Rule Applicability - Insignificant Activities

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(14), the insignificant trimmers are not subject to the requirements of 326 IAC 6-3 because the trimmers produce a negligible amount of PM, less than 0.551 pounds per hour.

Testing Requirements

All emission calculations were based on the MSDS for the coatings, therefore no testing is required.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to the emission units at this source.

Conclusion

The operation of this gravure coating and printing operation shall be subject to the conditions of the attached proposed Part 70 Permit **No. T 099-15362-00050**.

**Appendix A: Emissions Calculations
VOC and HAP
Rotogravure Printing Press**

Page 1 of 4 TSD App A

Company Name: Foil Laminating Inc., a Division of Glenmark Industries, Inc.
Address City IN Zip: 1000 Pidco Drive, Plymouth, Indiana 46563
OP: T 099-15362
Plt ID: 099-00050
Reviewer: Edward A. Longenberger
Date: March 8, 2002

Material	Maximum Line Speed (ft/min)	Maximum Print Width (in)	Substrate Throughput (in ² /hr)	Weight % Organics	Maximum Coverage (lb/in ²)	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Transfer Efficiency
Rotogravure (Unit #1)									
Grav. W.B. Ovenable Coating	500.00	33.00	11,880,000	5.96%	1.389E-05	9.83	236.03	43.08	100%

Potential to Emit

9.83 236.03 43.08

HAPs Emissions

Hazardous Air Pollutant	HAP Content (weight %)	Potential HAP (pounds per hour)	Potential HAP (pounds per day)	Potential HAP (tons per year)
Glycol Ether	0.40%	0.66	15.84	2.89
Styrene	0.10%	0.17	3.96	0.723
Diethanolamine	0.70%	1.16	27.72	5.06
Total		1.98	47.52	8.67

METHODOLOGY

VOC emission rate (lbs/hr) = Throughput (in² /hr) * Maximum Coverage (lb/in²) * Weight % Organics

VOC emission rate (lbs/day) = Throughput (in² /hr) * Maximum Coverage (lb/in²) * Weight % Organics * (24 hr/day)

VOC emission rate (tons/yr) = Throughput (in² /hr) * Maximum Coverage (lb/in²) * Weight % Organics * (24 hr/day) * (1 ton/2000 lbs)

HAP emission rate (lbs/hr) = Throughput (in² /hr) * Maximum Coverage (lb/in²) * Weight % HAP

HAP emission rate (lbs/day) = Throughput (in² /hr) * Maximum Coverage (lb/in²) * Weight % HAP * (24 hr/day)

HAP emission rate (tons/yr) = Throughput (in² /hr) * Maximum Coverage (lb/in²) * Weight % HAP * (24 hr/day) * (1 ton/2000 lbs)

**Appendix A: Emissions Calculations
VOC, Particulate and HAP
From Surface Coating Operations**

Page 2 of 4 TSD App A

Company Name: Foil Laminating Inc., a Division of Glenmark Industries, Inc.
Address City IN Zip: 1000 Pidco Drive, Plymouth, Indiana 46563
OP: T 099-15362
Plt ID: 099-00050
Reviewer: Edward A. Longenberger
Date: March 8, 2002

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Water Based Ovenable Coating (Unit#2)	8.70	58.60%	53.0%	5.6%	55.7%	37.38%	0.23000	67.500	1.10	0.49	7.56	181.53	33.13	0.00	1.30	100%
Water Based Ovenable Coating (Unit#3)	8.70	58.60%	53.0%	5.6%	55.7%	37.38%	0.23000	65.000	1.10	0.49	7.28	174.81	31.90	0.00	1.30	100%
Water Based Ovenable Coating (Unit#4)	8.70	58.60%	53.0%	5.6%	55.7%	37.38%	0.23000	57.300	1.10	0.49	6.42	154.10	28.12	0.00	1.30	100%

PM									Control Efficiency	0.00%						
Potential to Emit									Uncontrolled		21.27	510.44	93.15	0.00		
Add worst case coating to all solvents									Controlled		21.27	510.44	93.15	0.00		

HAPs Emissions

EU	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Styrene	Weight % Diethanolamine	Weight % Glycol Ethers	Styrene Emissions	Diethanolamine Emissions	Glycol Ether Emissions
							(tons/yr)	(tons/yr)	(tons/yr)
Unit #2	8.70	0.23000	67.500	0.10%	0.70%	0.40%	0.592	4.14	2.37
Unit #3	8.70	0.23000	65.000	0.10%	0.70%	0.40%	0.570	3.99	2.28
Unit #4	8.70	0.23000	57.300	0.10%	0.70%	0.40%	0.502	3.52	2.01
1.66							11.6	6.65	
							Overall Total	20.0	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Air Make-Up Unit and Cure Ovens**

Page 3 of 4 TSD App A

**Company Name: Foil Laminating Inc., a Division of Glenmark Industries, Inc.
Address City IN Zip: 1000 Pidco Drive, Plymouth, Indiana 46563
OP: T 099-15362
Plt ID: 099-00050
Reviewer: Edward A. Longenberger
Date: March 8, 2002**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
9.3500	81.91

Unit ID	Heat Input (mmBtu/hr)
Unit #1	1.80
Unit #2	2.00
Unit #3	0.75
Unit #4	1.00
Make-Up Unit	3.8
Total	9.35

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.078	0.311	0.025	4.10	0.225	3.44

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions
Air Make-Up Unit and Cure Ovens**

Page 4 of 4 TSD App A

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HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	8.60E-05	4.91E-05	3.07E-03	7.37E-02	1.39E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	2.05E-05	4.50E-05	5.73E-05	1.56E-05	8.60E-05	0.077

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.